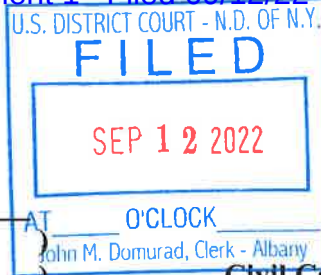


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

*Jeffery Barrett*  
*Kimberly Barrett* Plaintiff(s)

*Lew Grubham* vs

*Chad Moran* Defendant(s)

Civil Case No.: *3:22-cv-953*  
*(LEK/ML)*  
CIVIL  
RIGHTS  
COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983

Plaintiff(s) demand(s) a trial by: ☒ JURY \_\_\_\_\_ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

## JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

## PARTIES

2. Plaintiff: *JEFF Barrett, Kimberly Barrett*  
Address: *22 McAllister Road,*  
*Windsor N.Y. 13865*

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: \_\_\_\_\_  
Official Position: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. Defendant: Lew Grubham  
Official Position: Supervisor  
Address: 20 Crescent Drive  
Kirkwood NY ~~13796~~ 13795  
\_\_\_\_\_

c. Defendant: Chad Moran  
Official Position: Code officer  
Address: 20 Crescent Drive  
Kirkwood NY 13795  
\_\_\_\_\_

Additional Defendants may be added on a separate sheet of paper.

4.

#### FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

**Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint.** (You may use additional sheets as necessary).

Lew Grubham and Chad Moran did in  
fact force our Large Animal Rescue to  
close it's door's and remove All the animals  
from the place of service. This has been  
a place of shelter for the Horses and other  
Animals that Live at this place now for the  
past 15 month's.

5.

### CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

#### FIRST CAUSE OF ACTION

Lost a Land Lease for (6 month's)  
By Placing our personal info. to our home  
we now have people coming to our home  
All hours of the night

#### SECOND CAUSE OF ACTION

Forced us to Rehomed many Animals with  
out just cause.

#### THIRD CAUSE OF ACTION

By making the Recourse to close with A  
501c-3 and w.t. Lines for said place

6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

\$250,000.00 For the risk of all the Animals  
and for putting my family and our Home  
at Risk.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 9/9/22

Kimberly Barnett  
Kimberly Barnett

Signature of Plaintiff(s)  
(all Plaintiffs must sign)

02/2010